

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

J.C. individually, and all others
similarly situated,
 Plaintiffs

Civil Action

No. 15-4745

v.

Nicholas Ford, Steffen Boyd,
Josette Springer, Shonda Williams,
John W. Harrison E. Martinez, Steven Austin,
Darlene Miller, Charles Hoyt,
 Defendants

MOTION FOR DISQUALIFICATION UNDER 455 (b)

It is clear 455(b)(1), requires mandatory disqualification for actual partiality, when a judge “has a personal bias or prejudice toward a party”). You have not only worked beside Dembe for more than a decade, including supervising her when she first came in, but have been close friends with her continuously for three decades, have seen her in recent years. Plaintiff has knowledge that you have discussed this case with her. Your husband as we know not only has worked beside her for decades not only supervises her now (somehow she is still there, now under his command, despite being over 70), but is also very close friends with her. You would allege Dembe is not currently this minute an active party in that other case which you are claiming is related somehow. Even if that is true, it does not help you out at all. First, like jurisdictional issues, everything else, we have the time of filing rule, you don’t get past that period. Even if it did which it does not, her bogus dismissal has not been affirmed, not only could but should again be active after an appeal.

Not only this but we know your husband is a supervising purported robeowner, he “supervises”, manages, is responsible for the entire probation department and the criminals here and that other case. Public see attached. He has a stake, and a bias, and obviously so do you by virtue of he is your husband. You were disqualified the second the suits were filed, let alone the second you deplorably manipulated the system to get both of them, everything you have done is void. “To disqualify means to debar legally. That is synonymous with lack of legal capacity, i.e., with inability to serve”. Arnold v. Eastern Air Lines, Inc., 712 F.2d 899, 904 (4th Cir.1983), cert. denied, 464 U.S. 1040 (1984).

We know your actions were/are a plain- not to mention willful- violation of the terms of § 455(b), much more serious than (a). It is a fact that 455 applies retroactively, as well as prospectively and requires a purported judge, after violating the plain of the terms of § 455(b) to rectify the violations and to disqualify himself retrospectively and to vacate his judicial actions in the case, this is necessary to maintain public confidence in the impartiality of the judiciary¹

In Liljeberg, the Court held that.... he or she **should disqualify himself or herself retroactively** upon discovery of the facts that led to the current appearance of partiality. (Let alone actual indisputable bias) Id. at 861

In re School Asbestos Litigation, at 784.

You are not ever going to do that because you rigged it to get them to begin with. “The judge **should have recused at that time** and that he was **not empowered** to perform [any] judicial

¹ See Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847, 858 n. 7 & 861, (1988) (noting that a real judge is called upon “to take the steps necessary to maintain public confidence in the impartiality of the judiciary”); See also Ward v. Monroeville, 409 U.S. 57, 62 (1972) (stating that due process guarantees litigants a “neutral and detached judge in the first instance”).

actions thereafter”. Moody, at 138. “A judge who was obliged to recuse acts outside his jurisdiction” Moody, at 143.

CONCLUSION

Disqualify yourself immediately retroactively, vacate everything that came from you, randomly reassign each case. Accordingly fresh writs will be filed when you don’t comply.

J.C. Plaintiff

June 11th, 2018